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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBERT “SONNY” WOOD, an individual;
ACCESS MEDICAL, LLC, a Delaware limited
liability company,

Plaintiffs,

vs.

NAUTILUS INSURANCE GROUP, a Delaware
limited liability company, et al.,

Defendant.

NAUTILUS INSURANCE COMPANY,

Counter-claimant,

vs.

ROBERT “SONNY” WOOD; ACCESS
MEDICAL, LLC; FLOURNOY MANAGEMENT,
LLC AND ROES 1-10, inclusive,

Counter-defendants.

Case No.: 2:17-cv-02393-MMD-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO (1) PLAINTIFFS’ MOTION TO
AMEND COMPLAINT AND FOR
ALL ALLOWABLE DAMAGES
UNDER FRCP 54(C) (ECF NO. 421);
AND (2) PLAINTIFFS’ MOTION TO
AMEND SUMMARY JUDGMENT TO
CONFORM TO EVIDENCE UNDER
FRCP 52(C), FRCP 54(B), FRCP 59(B),
FRCP 60(A) (ECF NO. 422)**

(FIRST REQUEST)

1 Defendant/Counter-claimant, Nautilus Insurance Company (“Nautilus”), by and through its
 2 counsel, Armstrong Teasdale LLP and William S. Kronenberg, Esq. of Kronenberg Law PC (*pro hac*
 3 *vice*), and Plaintiffs, Access Medical, LLC and Robert “Sonny” Wood, II (collectively, “Plaintiffs”),
 4 by and through their counsel, The Schnitzer Law Firm, hereby stipulate to extend the deadlines for
 5 Nautilus to respond to the following Motions: (1) Plaintiffs Motion to Amend Complaint to Conform
 6 to Evidence and For All Allowable Damages Under FRCP 54(c) filed July 19, 2023 (ECF No. 421);
 7 and (2) Plaintiffs Motion to Amend Summary Judgment to Conform to Evidence Under FRCP 52(c),
 8 FRCP 54(b), FRCP 59(b), FRCP 60(a) filed July 21, 2023 (ECF No. 422) (collectively, the “Post-trial
 9 Motions”), by approximately one week, or to August 11, 2023. The respective deadlines to respond
 10 to the Post-trial Motions are August 2, 2023, and August 4, 2023. No hearing has been set for these
 11 motions. This is Nautilus’ first request to extend these deadlines.

12 Good cause exists to extend the response deadlines. Although Nautilus has been diligent to
 13 date in preparing its responses, Nautilus requires additional time to do so, in part, because one of its
 14 lead counsels is dealing with personal health conditions. Nautilus has requested approximately one
 15 week additional time, or to August 11, 2023, to file its responses to the Post-trial Motions, and
 16 Plaintiffs have no objection to the additional time. This request is made in good faith and is not
 17 intended to unreasonably delay this matter as Nautilus is seeking no more time that it believes is
 18 necessary.

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Based on the foregoing, the parties respectfully request that this Court extend Nautilus' deadlines to file its responses to the Post-trial Motions to August 11, 2023.

ARMSTRONG TEASDALE LLP

THE SCHNITZER LAW FIRM

By: /s/ Tracy A. DiFillippo

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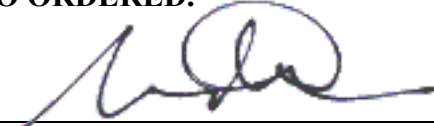
By: /s/ Jordan P. Schnitzer

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*Attorneys for Plaintiffs Access Medical LLC &
Robert Wood, II*

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATE: August 4, 2023